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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PENÄ GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

v.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF
ADELANTO, a municipal entity; GEO
LIEUTENANT DURAN, sued in her
individual capacity; GEO
LIEUTENANT DIAZ, sued in her
individual capacity; GEO
SERGEANT CAMPOS, sued in his
individual capacity; SARAH JONES,
sued in her individual capacity; THE
UNITED STATES OF AMERICA;
and DOES 1-10, individuals,

Defendants.

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Case No. 5:18-cv-01125-SP
[Honorable Sheri Pym]

PLAINTIFFS' EXHIBIT LIST

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Pursuant to Local Rule 16-6.1, Plaintiffs submit the following Exhibit List. Exhibit Nos. 1 through 115.

Plaintiffs reserve the right to amend, modify or supplement this list. Plaintiffs further reserve the right to introduce into evidence any of the exhibits listed by Defendants, including those for which Plaintiffs' objections are overruled.

PLAINTIFF'S EXHIBIT LIST

Exhibit No.	Description	Date Identified	Date Admitted
1	Surveillance Video (GEO 668)		
2	List of Demands produced by Plaintiffs as P000199-200.		
3	Medical Records signed by Dr. Medrano		
4	Medical records of dental and nursing encounters for Mr. Rivera Martinez		
5	Records of psychological encounter within the facility for Mr. Rivera Martinez (with Dr. Duelen)		
6	Dorm Officer Logbook from June 12, 2017 produced by GEO as GEO05119-05207.		
7	June 22, 2017 Office of Civil Rights and Civil Liberties Complaint filed by Nicole Ramos (P000190-000195)		
8	July 5, 2017 Office of Civil Rights and Civil Liberties Complaint filed by Nicole Ramos (P000158-000160)		
9	Plaintiff Julio Barahona Cornejo's Medical Report on Injuries, produced by GEO as GEO 02243.		
10	Plaintiff Isaac Lopez-Castillo's Medical Report on Injuries, produced by GEO as GEO 01055.		
11	Plaintiff Omar Rivera-Martinez's Medical Report on Injuries, produced by GEO as GEO 02242.		
12	Plaintiff Alexander Burgos Mejia's Medical		

Exhibit No.	Description	Date Identified	Date Admitted
	Report on Injuries, produced by GEO as GEO 00874.		
13	Plaintiff Luis Pena Garcia's Medical Report on Injuries, produced by GEO as GEO 01702.		
14	Plaintiff Marvin Grande Rodriguez's Medical Report on Injuries, produced by GEO as GEO 01858.		
15	Plaintiff Jose Cortez Diaz's Medical Report on Injuries, produced by GEO as GEO 01391.		
16	Plaintiff Josue Lemus Campos's Medical Report on Injuries, produced by GEO as GEO 00525.		
17	Adelanto Emergency Plans Manual: Hunger Strike Response Plan (GEO 02010-02014)		
18	Defendant City of Adelanto's Responses to Plaintiffs' Requests for Admissions, Set One, dated on May 17, 2019.		
19	Defendant City of Adelanto's Responses to Josue Mateo Lemus Campos's Interrogatories, Set One, dated on May 17, 2019.		
20	Defendant the GEO Group, Inc.'s Responses to Plaintiff Julio Cesar Barahona Cornejo's Interrogatories, Set One, dated on May 17, 2019.		
21	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set One		
22	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set Two		
23	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set Three		
24	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set Four		
25	Medical Records signed by Dr. Medrano		

Exhibit No.	Description	Date Identified	Date Admitted
26	General Incident Report - R. Gillon (GEO 02275-02276)		
27	General Incident Report - A. Burks (GEO 02272-02273)		
28	General Incident Report - J. Marmolejo (GEO 02270-02271)		
29	General Incident Report - G. Martinez (GEO 02267-02268)		
30	General Incident Report - L. Lacy (GEO 02264-02265)		
31	General Incident Report - A. Reyes (GEO 02261-02262)		
32	General Incident Report - F. Juarez (GEO 02258-02259)		
33	General Incident Report - Alvaro Lanuza (GEO 02255-02256)		
34	General Incident Report - Giovanni Campos (GEO 02251-02253)		
35	Use of Force Report - Jane Diaz (GEO 02236-02237)		
36	After-Action Review Report (GEO 02238-02240)		
37	Letter from Attorney Nicole Ramos to Adelanto Detention Center (P000158-000163)		
38	Voicemail from Lieutenant Barry Belt to Attorney Nicole Ramos (P000188)		
39	A. Video Still, view C-1 at 6:30:51; B. Video Still, view C-3 at 6:34:24; C. Video Still, view C-3 at 6:34:28; D. Video Still, view C-2 at 6:22:24; E. Video Still, view C-3 at 6:32:66; F. Video Still, view C-3 at 6:46:56; G. Video Still, view C-3 at 6:46:52; H. Video Still, view C-3 at 6:46:46; I. Video Still, view C-1 at 6:48:24; J. Video Still, view C-3 at 6:35:15;		

Exhibit No.	Description	Date Identified	Date Admitted
	K. Video Still, view C-3 at 6:35:26; L. Video Still, view C-3 at 6:36:50; M. Video Still, view C-3 at 6:38:19; N. Video Still, view C-3 at 6:46:52; O. Video Still, view C-2 at 6:38:54; P. Video Still, view C-2 at 6:39:36; Q. Video Still, view C-2 at 6:40:38; R. Video Still, view C-2 at 6:45:59; S. Video Still, view C-3 at 6:46:21; T. Video Still, view C-3 at 6:46:23; U. Video Still, view C-3 at 6:47:52; V. Video Still, view C-4 at 6:48:35; W. Video Still, view C-4 at 6:49:14.		
40	Plaintiff Rivera Martinez's grievances regarding phone number blocking (P000461 /GEO 00146)		
41	Plaintiff Rivera Martinez' grievance re his dental crown (P000459-000460)		
42	Phone Call recording of Plaintiff Rivera Martinez.		
43	Plaintiff Lopez Castillo list of blocked phone numbers.		
44	Water Temperatures at Adelanto Detention Center.		
45	Picture of Plaintiff Omar Rivera Martinez (GEO 00135)		
46	Picture of Plaintiff Luis Pena Garcia (GEO 01738)		
47	Picture of Plaintiff Mateo Lemos Campos (GEO 00482)		
48	Picture of Plaintiff Alex Burgos Meijia (GEO 00938)		
49	Picture of Plaintiff Julio Barahona Cornejo (GEO 01575)		
50	Picture of Plaintiff Marvin Grande Rodriguez (GEO 01879)		

Exhibit No.	Description	Date Identified	Date Admitted
51	Picture of Plaintiff Isaac Lopez Castillo (GEO 01078)		
52	Picture of Jose Bladimir Cortez Diaz (GEO 01244)		
53	Picture of ninth hunger striker (GEO 01666)		
54	Emails from Attorney Nicole Ramos to Immigration and Customs Enforcement Agency officers (P000161-000163)		
55	Declaration of Hussain Turk (P000447-000448)		
56	Intergovernmental Services Agreement between ICE and the City of Adelanto, accessed as a public record.		
57	American Civil Liberties Union letter to Gabriel Valdez at ICE produced by Plaintiffs as P000010-14.		
58	Plaintiffs' Grievances to ICE following June 12, 2017 incident.		
59	Martinez: Talton Call #76		
60	Article: "GEO Group Whistleblower Exposes First Amendment Violations, Lack of Officer Training, and Poor Conditions at the Adelanto Detention Center" (P000416-000418)		
61	Article: "Why Immigrant Detainees in California Just Launched A Hunger Strike" (P000419-425)		
62	Article: "Third Death In Immigration Detention Makes the Adelanto Detention Center the Deadliest Facility in 2017" (P000426)		
63	Article: "'We don't feel OK here': Detainee deaths, suicide attempts and hunger strikes plague California immigration facility" (P000427-000432)		
64	OIG Report (September 2018)		
65	Report of Plaintiffs' Expert Dr. Jeffrey		

Exhibit No.	Description	Date Identified	Date Admitted
	Schwartz		
66	Dr. Jeffrey Schwartz CV		
67	Report of Plaintiffs' Expert Dr. Homer Venters		
68	Dr. Homer Venters CV		
69	SIR035317 – James Janecka (GEO 02226-02233)		
70	Adelanto Policy & Procedure Manual: Use of Force (GEO 01986-02002)		
71	Adelanto Policy & Procedure Manual: Detainee Access to Telephone (GEO 02003-02009)		
72	GEO Group Training Presentation: Use of Force (GEO 02083-02158)		
73	GEO Group Segregated Housing Unit Policy		
74	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Julio Barahona Cornejo (GEO 01535)		
75	Incident of Prohibited Acts and Notice of Charges for Julio Barahona Cornejo (GEO 01539)		
76	Investigation Report for Julio Barahona Cornejo (GEO 01541)		
77	Institution Disciplinary Panel Report for Julio Barahona Cornejo (GEO 01549-50)		
78	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Julio Barahona Cornejo (GEO 01534)		
79	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Isaac Lopez Castillo (GEO 01119)		
80	Incident of Prohibited Acts and Notice of Charges for Isaac Lopez Castillo (GEO 01123)		
81	Investigation Report for Isaac Lopez Castillo (GEO 01125)		

Exhibit No.	Description	Date Identified	Date Admitted
82	Institution Disciplinary Panel Report for Isaac Lopez Castillo (GEO 01133-34)		
83	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Isaac Lopez Castillo (GEO 01118)		
84	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Alexander Burgos Mejia (GEO 00961)		
85	Incident of Prohibited Acts and Notice of Charges for Alexander Burgos Mejia (GEO 00966)		
86	Investigation Report for Alexander Burgos Mejia (GEO 00968)		
87	Institution Disciplinary Panel Report for Alexander Burgos Mejia (GEO 00976-77)		
88	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Alexander Burgos Mejia (GEO 00960)		
89	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Josue Lemus Campos (GEO 00524)		
90	Incident of Prohibited Acts and Notice of Charges for Josue Lemus Campos (GEO 00528)		
91	Investigation Report for Josue Lemus Campos (GEO 00530)		
92	Institution Disciplinary Panel Report for Josue Lemus Campos (GEO 00538-539)		
93	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Josue Lemus Campos (GEO 00523)		
94	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Luis Pena Garcia (GEO 01744)		
95	Incident of Prohibited Acts and Notice of Charges for Luis Pena Garcia (GEO 01747)		
96	Investigation Report for Luis Pena Garcia		

Exhibit No.	Description	Date Identified	Date Admitted
	(GEO 01749)		
97	Institution Disciplinary Panel Report for Luis Pena Garcia (GEO 01757-58)		
98	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Luis Pena Garcia (GEO 01743)		
99	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Omar Rivera Martinez (GEO 00165)		
100	Incident of Prohibited Acts and Notice of Charges for Omar Rivera Martinez (GEO 00168)		
101	Investigation Report for Omar Rivera Martinez (GEO 00170)		
102	Institution Disciplinary Panel Report for Omar Rivera Martinez (GEO 00178-79)		
103	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Omar Rivera Martinez (GEO 00164)		
104	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Jose Cortez Diaz (GEO 01390)		
105	Incident of Prohibited Acts and Notice of Charges for Jose Cortez Diaz (GEO 01394)		
106	Investigation Report for Jose Cortez Diaz (GEO 01396)		
107	Institution Disciplinary Panel Report for Jose Cortez Diaz (GEO 01404-05)		
108	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Jose Cortez Diaz (GEO 01389)		
109	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Marvin Grande Rodriguez (GEO 01916)		
110	Incident of Prohibited Acts and Notice of Charges for Marvin Grande Rodriguez (GEO 01920)		

Exhibit No.	Description	Date Identified	Date Admitted
111	Investigation Report for Marvin Grande Rodriguez (GEO 01922)		
112	Institution Disciplinary Panel Report for Marvin Grande Rodriguez (GEO 01930-31)		
113	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Marvin Grande Rodriguez (GEO 01915)		
114	[BLANK]		
115	[BLANK]		

Dated: January 7, 2020

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